

Updated and Expanded Testimony of Bruce Redman Becker
Before the Energy and Technology Committee

In regard to
Raised Bill 415 – An Act Concerning the Operations of the Department of
Energy and Environmental Protection, the Establishment of a Commercial
Property Assessed Clean Energy Program, Water Conservation and the
Operations of the Clean Energy Finance and Investment Authority

Submitted by
Bruce Redman Becker, AIA, AICP, LEED AP
President, Becker and Becker Associates, Inc. of Fairfield, CT
March 14, 2012

I am the architect and developer of 360 State Street in New Haven, the largest residential building in the State, as well as the largest LEED Platinum building Connecticut. This 500 unit mixed use building has a full service cooperative grocery store, a bike shop and 500 garage spaces and is located adjacent to the State Street train station, making it a model for green transit oriented development. 360 State is designed to use 55% less energy than a new code compliant apartment building, and its units use 75% less energy than the average home in the State.

I fully support the forward thinking energy policy and implementation plans being carried out through Raised Bill 415, however two recommendations:

- 1) The Tax Credit Cap in Section 54 should be removed.

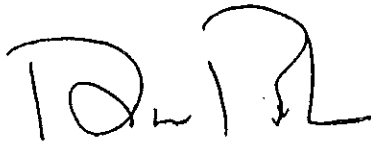
The \$8 million per project cap in allocation of the Green Building Tax Credit is problematic because the Green Building Tax Credit was the incentive that induced the Multi-Employer Property Trust, a union pension plan, to fund a broad range green building measures as part of an overall investment of \$150 million in 360 State Street in New Haven.

No cap on the tax credit was ever contemplated previously by the State, and the potential of a cap only surfaced for the first time last week in Section 54 of Raised Bill 415. It undermines the effectiveness and integrity of incentives to modify them after criteria for earning them have been met. Modifying incentives, after the fact, would discourage future investments in green building in the State of Connecticut and send a message to the investment community that such incentives cannot be relied on. Predictability is essential to the effectiveness of any green building incentive.

2) A provision should be added to allow sub-metering in residential buildings with Combined Heat and Power.

Allowing sub-metering in residential buildings with Combined Heat and Power (CHP) will foster job creation, investment and significant energy savings. CHP allows buildings and domestic hot water to be heated by the waste heat that is a by-product of generating electricity from gas turbines or fuel cells. The efficiency of CHP provides a direct reduction of 30 - 40% in fuel and utility costs and associated environmental impacts. In Connecticut CHP is not possible in residential buildings because of restrictions on sub-metering (unlike neighboring States such as New York which has permitted residential sub-metering in all residential buildings since 1988). Because of this restriction, and despite three years of attempts to gain discretionary approvals for sub-metering by DPUC and PURA, the fuel cell installed over a year ago at 360 State Street has been running at only about half of its 400kw capacity, and unable to deliver the significant environmental and efficiency benefits of CHP. For this reason, please modify Raised Bill 415 to add the term "apartments served by combined heat and power" to marinas and campgrounds as facilities where sub-metering is permitted under section 16-19ff of the General Statutes.

Thank you very much for the opportunity to comment on this bill, and for your support in allowing 360 State Street and projects like it to be successful models for energy efficiency and sustainable development.

A handwritten signature in black ink, appearing to read 'B. Redman Becker'.

Bruce Redman Becker, President
Becker and Becker Associates, Inc.
95 Reef Road, Fairfield, CT
bruce@beckerandbecker.com
